LOWENSTEIN SANDLER PC

65 Livingston Avenue Roseland, New Jersey 07068-1791 973.597.2540 Attorneys for Defendant Cornell-Dubilier Electronics, Inc.

HOME INSURANCE COMPANY, PLAINTIFF,

v.

CORNELL-DUBILIER
ELECTRONICS, INC., ET AL.,
DEFENDANTS.

CORNELL-DUBILIER ELECTRONICS, INC., ET AL., PLAINTIFFS,

V.

UNITED INSURANCE COMPANY, DEFENDANT.

CORNELL-DUBILIER ELECTRONICS, INC., ET AL., PLAINTIFFS,

V.

COLUMBIA CASUALTY COMPANY, ET AL., DEFENDANTS.

SUPERIOR COURT OF NEW JERSEY LAW DIVISION: MERCER COUNTY

Civil Action Docket No. MER-L-5192-96

Civil Action
Docket No. MER-L-2773-02

Civil Action
Docket No. MER-L-463-05

NOTICE OF MOTION OF CORNELL-DUBILIER ELECTRONICS, INC. FOR SUMMARY JUDGMENT AGAINST THE LONDON MARKET INSURERS WITH RESPECT TO THE EXXON POLICIES

TO: All Counsel Of Record

PLEASE TAKE NOTICE that on Friday, September 10 at 1:00 p.m. or as soon thereafter as counsel may be heard, the undersigned, attorneys for defendant Cornell-Dubilier Electronics, Inc. ("CDE") will move before the Honorable Douglas H. Hurd, J.S.C. at the Mercer County Court House, 175 South Broad Street, Trenton, New Jersey for an Order granting Summary Judgment on the Issue of Coverage against the London Market Insurers with respect to the Exxon Policies (the "Policies") and making the following findings: that the Policies provide coverage for CDE's claims with respect to the South Plainfield and Dismal Swamp Sites.

PLEASE TAKE FURTHER NOTICE that CDE will rely upon: (1) Memorandum of Law of Cornell-Dubilier Electronics, Inc. In Support of Its Motion for Summary Judgment Against The London Market Insurers With Respect To the Exxon Policies; (2) Concise Statement of Undisputed Material Facts In Support of Motion of Cornell-Dubilier Electronics, Inc. for Summary Judgment Against The London Market Insurers With Respect To the Exxon Policies; and (3) the Certification of Robert S. Sanoff In Support of Motion of Cornell-Dubilier Electronics, Inc. for Summary Judgment Against The London Market Insurers With Respect To the Exxon Policies. A proposed form of Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that CDE requests oral argument.

Respectfully Submitted,

LOWENSTEIN SANDLER PC

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By:

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Attorneys for Defendant

Cornell-Dubilier Electronics, Inc.

DATED: June 15, 2010